

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

JAZZMAN LEVERT DANIEL)	
)	
Plaintiff,)	
v.)	Civil Action No. 2:16-cv-00701
)	
BEN FRAZER,)	
)	
JOSEPH RONAN, and)	
)	
JOSEPH DEBOARD,)	
)	
Defendants.)	
)	

**DEFENDANTS' MOTION FOR A PROTECTIVE ORDER PURSUANT TO FEDERAL
RULE OF CIVIL PROCEDURE 26(c)**

Come now the Defendants in this matter and request the entry of a protective order pursuant to Federal Rule 26(c)(A) staying the Plaintiff's request for discovery while the Defendants' Rule 12 motions, which include an assertion of qualified immunity, are pending. The grounds for this motion are also set forth more fully in the attached memorandum incorporated by reference herein.

Date: April 25, 2017

Respectfully Submitted,

DEFENDANTS BEN FRAZER, JOSEPH RONAN and JACOB DEBOARD

_____/s/_____
Richard E. Hill, Jr., VSB #44164
Assistant City Attorney
Office of the City Attorney, City of Richmond
City Hall, Suite 400
900 East Broad Street
Richmond, VA 23219
Telephone: (804) 646-7946
Facsimile: (804) 646-7939
Richard.E.Hill@richmondgov.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2017, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, and I will send via first-class mail, postage pre-paid notification of such filing to the following non-filing user:

Jazzman Levert Daniel, *pro se*, Inmate #111558
Richmond City Jail
1701 Fairfield Way
Richmond, VA 23223

_____/s/_____
Richard E. Hill, Jr., VSB #44164
Assistant City Attorney
Office of the City Attorney
City of Richmond
City Hall, Room 400
900 East Broad Street
Richmond, VA 23219
Telephone: (804) 646-7946
Facsimile: (804) 646-7939
Richard.E.Hill@richmondgov.com
Counsel for Defendants